

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

Civil Action No. 1:14-cv-00929-JB-CG

BRIANA BRITO, on behalf of herself and all others
similarly situated;

Plaintiff,

v.

COMMUNITY HEALTH SYSTEMS, INC., a Delaware
Corporation; COMMUNITY HEALTH SYSTEMS
PROFESSIONAL SERVICES CORPORATION, a
Delaware Corporation; ALTA VISTA REGIONAL
HOSPITAL; CARLSBAD MEDICAL CENTER; EASTERN
NM MEDICAL CENTER; MIMBRES MEMORIAL
HOSPITAL; MOUNTAINVIEW REGIONAL MEDICAL
CENTER; & LEA REGIONAL MEDICAL CENTER,

Defendants.

UNOPPOSED MOTION FOR EXTENSION

Community Health Systems Professional Services Corporation (CHSPSC), and
Alta Vista Regional Hospital, Carlsbad Medical Center; Eastern NM Medical Center,
Mimbres Memorial Hospital, Mountainview Regional Medical Center, & Lea Regional
Medical Center (collectively, the “Local Defendants”) respectfully move the Court for an
extension of thirty days, or until November 24, 2014, to move, plead, or otherwise
respond to plaintiff’s complaint. This motion is unopposed.

In support of this motion, these defendants state as follows:

1. Plaintiff filed her complaint on September 19, 2014 in New Mexico state
court and served CHSPSC and the Local Defendants with the summons and complaint
on September 29, 2014. (See Notice of Removal ¶¶ 1, 6 & Ex. A, part 2 at pp. 16-42.)

2. Pursuant to N.M. R. Civ. P. 1-012(A), CHSPSC and the Local Defendants' responses to plaintiff's complaint were due on October 29, 2014. Under Fed. R. Civ. P. 81(c) the responses are currently due on October 23, 2014.

3. Several other plaintiffs have also filed putative class actions in federal court and these cases are now the subject of a proceeding before the Judicial Panel on Multidistrict Litigation captioned *In re Community Health Systems, Inc., Customer Data Security Breach Litigation*, MDL No. 2595. The related cases are: *Alverson, et al. v. Community Health Systems, Inc., et al.*, No. 2:14-cv-01620 (N.D. Ala.); *Lawson, et al. v. Community Health Systems, Inc., et al.*, No. 3:14-cv-00712 (S.D. Miss.); *Roman v. Community Health Systems, Inc. et al.*, No. 3:14-cv-01705 (M.D. Pa.); and *Glah, et al. v. Community Health Systems, Inc., et al.*, No. 2:14-cv-25783 (S.D. W. Va.).

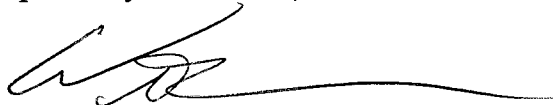
4. The defendants intend to seek a stay of this action pending the Panel's transfer decision and have already made similar motions in the Alverson and Roman cases. The plaintiff would not agree to a stay at this time but agreed to revisit the issue. Plaintiff agreed to provide defendants with an additional thirty days to respond to plaintiff's complaint.

5. Pursuant to Local Rule 7.2, a proposed order approved by plaintiff and defendants is submitted along with this motion.

ACCORDINGLY, CHSPSC and the Local Defendants respectfully move the Court for a thirty-day extension to move, plead, or otherwise respond to plaintiff's complaint up to and including November 24, 2014.

Dated this 23d day of October, 2014

Respectfully submitted,



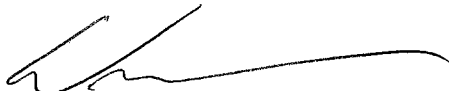
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Corporation, Alta Vista Regional
Hospital, Carlsbad Medical Center;
Eastern NM Medical Center, Mimbres
Memorial Hospital, Mountainview
Regional Medical Center, & Lea
Regional Medical Center*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND** was served on this 23d day of October, 2014, via the Court's ECF system on all registered parties, and by regular U.S. mail to the following:

Community Health Systems, Inc.
c/o Ben Fordham
4000 Meridian Blvd.
Comm. Health Systems
Franklin, TN 37067-6325



William C. Madison